

PERMIT ATTACHMENT 5
HANFORD FACILITY PERSONNEL TRAINING PROGRAM
CHANGE CONTROL LOG

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have its own change control log with a modification history table. The “**Modification Number**” represents Ecology’s method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Modification History Table

Modification Date	Modification Number
09/30/2015	8C.2015.Q3

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5 HANFORD FACILITY PERSONNEL TRAINING PROGRAM

This Attachment provides a description of the Hanford Facility Personnel Training program. This program description includes the elements necessary to demonstrate compliance with WAC 173-303-330. The Training Program described in this Attachment is applicable to Hanford Facility personnel¹. The Hanford Facility Personnel Training program consists of general facility training and unit group-specific training, and includes classroom instruction or on the job training (OJT). Classroom instruction and OJT is identified in the unit specific training plans in Parts III, and V. Unit group-specific training is specific to particular dangerous waste management unit groups or operationally related dangerous waste management unit groups in the Permit.

5.1 Introductory and Continuing Training

Introductory and continuing training are designed to prepare Hanford Facility personnel to manage and maintain the unit groups in Permit Parts III, and V in a safe, effective, and environmentally sound manner and to perform waste management duties related to their job descriptions located in the unit specific training plans. In addition to preparing personnel to manage and maintain these dangerous waste management unit groups under normal conditions, the training ensures that personnel are prepared to respond in a prompt and effective manner should abnormal or emergency conditions occur. Emergency response training is based upon WAC 173-303-330(1)(e) and is consistent with the description of actions contained in unit specific contingency plans. The introductory and continuing training will provide the following:

- Teach Hanford Facility personnel to perform their duties in a way that ensures the Hanford Facility's compliance with WAC 173-303.
- Teach Hanford Facility personnel dangerous waste management procedures, including implementation of the Contingency Plan, relevant to the job titles/positions in which they are employed.
- Ensure Hanford Facility personnel can respond effectively to emergencies.

5.1.1 Introductory Training

Introductory Training consists of the following: General Hanford Facility Orientation, Contingency Plan Training, Emergency Coordinator Training, and Operations Training.

Introductory training includes general facility training and any unit specific training applicable to Hanford Facility personnel job descriptions and work assignments. Hanford Facility personnel cannot perform a waste management duty, for which they are not properly trained, except to gain required experience while under the direct supervision of a person knowledgeable in dangerous waste management procedures, and must include training relevant to the positions in which the facility personnel are employed. Upon successful completion of introductory training, Hanford Facility personnel may work unescorted/unsupervised.

Hanford Facility personnel must be trained within six months after their employment at or assignment to the Hanford Facility, or to a new job title/position at the Hanford Facility, whichever is later. Retraining of introductory training may not be necessary when Hanford Facility personnel are reassigned. Prior to completion of required training, new Hanford Facility personnel must work under the direct supervision of trained personnel until the training is completed. [WAC 173-303-330(1)(c)].

5.1.1.1 General Hanford Facility Orientation

General Hanford Facility Orientation provides an orientation to dangerous waste management activities being conducted on the Hanford Facility. General facility orientation provides:

¹ Based on WAC 173-303-040 'personnel' or 'facility personnel' means all persons who work at, or oversee the operations of, a dangerous waste facility, and whose actions or failure to act may result in noncompliance with the requirements of WAC 173-303-280 through 173-303-395 and 173-303-600 through 173-303-695.

- Description of emergency signals and appropriate response.
- Identification of contact(s) for emergencies involving dangerous waste and dangerous waste management activities.
- Training records for General Hanford Facility Orientation are only maintained for Hanford Facility personnel as defined in this Attachment.

5.1.1.2 Contingency Plan Training

This training includes actions required to meet applicable training requirements of WAC 173-303-330(1)(e), to respond effectively to emergencies at each unit group in Parts III, V, and VI that may be applicable to the job title/position of a particular individual.

5.1.1.3 Emergency Coordinator Training

Hanford Facility personnel whose job title/position require performing emergency coordinator duties, defined in Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 4.2 [e.g., Building Emergency Director] in the Hanford Incident Command System, receive training on implementation of the contingency plan and training assigned in applicable unit group-specific Permit conditions in Permit Parts III, V, and VI. In accordance with WAC 173-303-360(1), Emergency coordinators must also be thoroughly familiar with operations, activities, location and properties of all waste handled, location of all records, and the unit/building layout for each unit group to which they are assigned.

5.1.1.4 Operations Training

Dangerous waste management operations training (e.g., waste designation training, shippers training) is specified for particular job title/positions in the unit group specific requirements in the Permit Parts III, V, and VI. Operations training provides training to Hanford Facility personnel on the operation of dangerous waste management units (e.g., container management unit) and the type of activities performed at the waste management unit (e.g., sampling).

5.1.2 Continuing Training

Continuing training, required by WAC 173-303-330(1)(b), includes review of general facility training and unit specific training, as specified below:

- General Hanford Facility training: Annual refresher training is provided for General Hanford Facility Training (Section 5.1.1.1).
- Contingency Plan Training: Annual refresher training is provided for Contingency Plan Training (Section 5.1.1.2.).
- Emergency Coordinator Training: Annual refresher training is provided for Emergency Coordinator Training (Section 5.1.1.3).
- Operations Training: Refresher training occurs annually, every other year, or every three years for operations training. One-time only training does not contain refresher courses, and will be identified as a one-time only training course. The TSD unit group specific training plan will specify the frequency for each operations training course.

Continuing training is administered annually, and includes training with two-year or three-year retraining frequencies. A course is administered annually if it is administered not less than 30 days after the retraining date set for that course.

5.2 Elements of Unit Specific Training

Unit group specific training requirements not addressed in Permit Condition II.C, and Attachment 5 for Hanford Facility personnel assigned to dangerous waste management units are included in Permit Parts III, and V. Each unit group specific Chapter will contain an Addendum consisting of a Training matrix, and applicable requirements of WAC 173-303-330(1)(e). Each training matrix contains the following:

- Training categories (from Permit Attachment 5, Sections 5.1.1 and 5.1.2).
- Job title/position (e.g., staff, dangerous waste worker categories, building emergency director).
- Breakdown of operations training (e.g., container management, tank system management).

Changes to the unit specific-group training matrix are subject to the modification in accordance with Permit Condition I.C.3.

5.3 Training Records

Personnel training records are maintained in hard copy form or by using electronic data storage as specified in WAC 173-303-330(3). At a minimum, training records will consist of proof of course completion (e.g., electronic signature, supervisor initials, and database) for the training received, and training date(s). Training records are maintained in accordance with the requirements of WAC 173-303-330(2)(c) and (3).

5.4 Training Program Direction

Staff knowledgeable in dangerous waste management procedures directs the training program for Hanford Facility personnel. The responsibility for directing the program may be divided among subject matter experts, unit management, a training organization, or some combination of these. The specific identity of the staff responsible for direction of the program is available from the unit operations supervisor and from the Permittee's central compliance organization.

Direction of the training program is met by the following:

- Subject Matter Experts: Knowledgeable person regarding applicable dangerous waste management requirements to provide for compliance with WAC 173-303.
- Unit Management: Identify roles, responsibilities, and training for Hanford Facility personnel assigned to the unit in accordance with the training plan.
- Training Organization: Collect and record documentation of training taken by Hanford Facility personnel, and maintain training records.

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